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July 14, 2016

**BY ECF**

Honorable Judge George B. Daniels  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

SO ORDERED:

*George B. Daniels*  
George B. Daniels, U.S.D.J.  
JUL 18 2016

Dated: \_\_\_\_\_

Re: Erickson Cabrera v. City of New York et al.  
16 CV 1098 (GBD)

Your Honor:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department and the attorney assigned to the defense of the City and Police Officer Brian Dennis in the above-referenced matter. Defendants write to request a one week extension from Friday July 15, 2016 to Friday July 22, 2016 within which defendants may file our proposed motion to dismiss. The undersigned needs the additional time to attend to a family medical emergency. Defendants also request the deadlines for plaintiff's motion in opposition now due July 29, 2016 be extended to August 5, 2016 and defendants' reply also be extended by a week from August 5, 2016 to August 12, 2016. The oral argument is currently scheduled for August 18, 2016 at 10:30 a.m. Plaintiff's counsel, Gabriel Harvis, Esq., has consented to the extension.

Defendants thank the Court for its consideration in this matter.

Respectfully submitted,

*[Signature]*  
Paul H. Johnson  
Assistant Corporation Counsel  
Special Federal Litigation Division

cc: Gabriel Harvis, Esq. (via ECF)  
*Attorney for Plaintiff*  
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